

1/26/07

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VISIBLE SYSTEMS CORPORATION,

Plaintiff

v.

UNISYS CORPORATION,

Defendant

Civil Action No. 04-CV-11610-RGS

DEFENDANT'S MOTION TO FILE OPPOSITION PAPERS UNDER SEAL

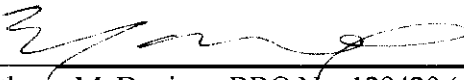
Pursuant to Local Rule 7.2 of this District Court, the defendant, Unisys Corporation, respectfully moves for an order permitting it to file under seal all papers in connection with its Opposition to Plaintiff's Motion to Supplement Expert Disclosure and Take Deposition Out of Time. The papers are being submitted to the Court herewith in a sealed envelope. The documents and information on which Unisys's Opposition relies includes materials governed by a Confidentiality Agreement between the parties and a Protective Order entered by this Court on November 10, 2005. Pursuant to the terms of that Agreement and Order, Unisys is obligated to file such protected documents, and court papers disclosing their contents, under seal.

Pursuant to Local Rule 7.2(a), Unisys suggests that the Opposition papers be filed with this Court in a clearly marked envelope or other packaging, to which the Clerk should attached a copy of this Court's order; and that upon further order of this Court dissolving any such order, the documents should be returned to Unisys's counsel.

WHEREFORE, Unisys respectfully requests that this Court issue an order permitting Unisys to file under seal all papers in connection with its Opposition to Plaintiff's Motion to

Supplement Expert Disclosure and Take Deposition Out of Time and that said papers be withheld from public inspection until further order of this Court.

Defendant,
UNISYS CORPORATION,
By Its Attorneys,



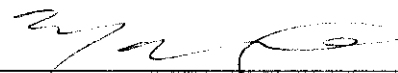
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101 Merrimac Street
Boston, MA 02114
617-227-3030

Dated: January 26, 2007

CERTIFICATE OF SERVICE

I hereby certify that on the above date this document was sent via Federal Express to:

Stephen H. Galebach, Esquire
Galebach Law
9-11 Touro Avenue
Medford, MA 02155



Matthew C. Welnicki